



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
BROOKFIELD PLACE, 200 VESEY STREET, SUITE 400
NEW YORK, NY 10281-1022

NEW YORK
REGIONAL OFFICE

April 12, 2021

By ECF

Hon. Paul A. Crotty
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: *Securities and Exchange Commission v. Lev Parnas and David Correia*, 21 Civ. 995 (PAC)

Dear Judge Crotty:

Plaintiff Securities and Exchange Commission (the “Commission”), joined by defendant David Correia (“Correia”), respectfully request that the Court lift its stay of this case (Dkt. No. 22) for the limited purpose of seeking approval of a proposed final consent judgment against Correia (the “Proposed Final Judgment”). The U.S. Attorney’s Office for the Southern District of New York, which moved to stay this case, has no objection to the stay being lifted for this limited purpose. Counsel for defendant Lev Parnas has not responded to the Commission’s requests for his position by email on April 8 and 9. The Commission and Correia further request that, if the Court temporarily lifts the stay, it approve the Proposed Final Judgment, which would fully resolve the Commission’s remaining claims against Correia in this action.

The Proposed Final Judgment is fair and reasonable and in the public interest. *See, e.g., SEC v. Citigroup Global Markets, Inc.*, 752 F.3d 285 (2d Cir. 2014) (setting out standard for reviewing proposed consent judgments in government enforcement actions). Among other things, the Proposed Final Judgment would (1) permanently enjoin Correia from committing further violations of the antifraud and broker registration provisions of the federal securities laws the Commission’s Complaint alleges he violated; and (2) order Correia to pay disgorgement of \$43,650, together with prejudgment interest thereon of \$10,406, deemed satisfied by the order of restitution entered against Correia in *United States v. Lev Parnas, et al.*, 19 Cr. 725 (JPO) (S.D.N.Y.). The Proposed Final Judgment would not impose a civil penalty against Correia.

If the Court approves the Proposed Final Judgment, the Commission respectfully requests that the Court docket the executed Final Judgment with the consent attached.

Respectfully submitted,
/s/ Lee A. Greenwood
Lee A. Greenwood
Senior Trial Counsel

cc: All counsel of record (by ECF)
Defendant David Correia (*pro se*) (by email)